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15 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 \_\_\_\_\_  
18 In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION  
19 \_\_\_\_\_

) Case No. 07-5944-SC  
)  
) MDL No. 1917  
)  
) **DECLARATION OF TIFFANY B. GELOTT**  
) **IN SUPPORT OF DEFENDANTS PHILIPS**  
) **ELECTRONICS NORTH AMERICAN**  
) **CORPORATION'S, PHILIPS TAIWAN**  
) **LIMITED'S, AND PHILIPS DO BRASIL**  
) **LTD'A.'S REPLY IN SUPPORT OF**  
) **MOTION FOR PARTIAL SUMMARY**  
) **JUDGMENT**  
)  
) Date: February 6, 2015  
) Time: 10:00 a.m.  
) Place: Courtroom 1, 17th Floor  
)  
) Hon. Samuel P. Conti  
)  
)  
28 Best Buy Co., Inc. v. Hitachi, Ltd., )

1	No. 11-cv-05513;	)
2	<i>Best Buy Co., Inc. v. Technicolor SA,</i>	)
3	No. 13-cv-05264;	)
4	<i>Interbond Corp. of Am. v. Hitachi, Ltd.,</i>	)
5	No. 11-cv-06275;	)
6	<i>Interbond Corp. of Am. v. Technicolor SA,</i>	)
7	No. 13-cv-05727;	)
8	<i>Office Depot, Inc. v. Hitachi, Ltd.,</i>	)
9	No. 11-cv-06276;	)
10	<i>Office Depot, Inc. v. Technicolor SA,</i>	)
11	No. 13-cv-05726;	)
12	<i>CompuCom Sys., Inc. v. Hitachi, Ltd.,</i>	)
13	No. 11-cv-06396;	)
14	<i>P.C. Richard &amp; Son Long Island Corp. v.</i>	)
15	<i>Hitachi, Ltd.,</i>	)
16	No. 12-cv-02648;	)
17	<i>P.C. Richard &amp; Son Long Island Corp. v.</i>	)
18	<i>Technicolor SA,</i>	)
19	No. 13-cv-05725;	)
20	<i>Schultze Agency Servs., LLC v. Hitachi, Ltd.,</i>	)
21	No. 12-cv-02649;	)
22	<i>Schultze Agency Servs., LLC v. Technicolor SA,</i>	)
23	No. 13-cv-05668;	)
24	<i>Tech Data Corp. v. Hitachi, Ltd.,</i>	)
25	No. 13-cv-00157;	)
26	<i>Sears, Roebuck and Co. and Kmart Corp. v.</i>	)
27	<i>Technicolor SA,</i>	)
28	No. 13-cv-05262	)
	<i>Sears, Roebuck and Co. and Kmart Corp. v.</i>	)
	<i>Chunghwa Picture Tubes, Ltd.,</i>	)
	No. 11-cv-05514	)
	<i>Sharp Electronics Corp. v. Hitachi Ltd.,</i>	)
	No. 13-cv-1173 SC	)
	<i>Sharp Electronics Corp. v. Koninklijke Philips</i>	)

1      *Elecs., N.V.*,  
2      No. 13-cv-2776 SC  
3  
4      *ViewSonic Corp. v. Chunghwa Picture Tubes,  
Ltd.*,  
5      No. 14-cv-2510 SC  
6  
7      *All Indirect Purchaser Actions*

1 I, Tiffany Gelott, declare and state as follows:

2       1. I am an attorney with Baker Botts LLP, attorneys for Philips Electronics North America  
3 Corporation (“PENAC”), Philips Taiwan Limited (“PTL”), and Philips do Brasil, Ltda. (“PDBL”)  
4 (collectively, the “Philips Subsidiaries”) in the above-captioned action. I am a member of the bar of  
5 the District of Columbia and have been admitted to practice before this Court on this matter pro hac  
6 vice. I make this declaration in support of the Philips’ Subsidiaries’ Reply in Support of Motion for  
7 Partial Summary Judgment. The information contained herein is based on my own personal  
8 knowledge, and if called as a witness I could, and would, testify competently that the matters set forth  
9 herein are true.

10       2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Deposition of  
11 Jim Smith (12/12/2013) (“Smith Dep.”).

12       3. Attached hereto as Exhibit 2 is a true and correct copy of the document bearing bates  
13 number, PHLP-CRT-148288, that was produced in this litigation by Koninklijke Philips N.V  
14 (“KPNV”) and PENAC.

15       4. Attached hereto as Exhibit 3 is a true and correct copy of the document bates numbers,  
16 PHLP-CRT-150976 through PHLP-CRT-150977, that was produced in this litigation by KPNV and  
17 PENAC.

18       5. Attached hereto as Exhibit 4 is a true and correct copy of the document bates numbers,  
19 PHLP-CRT-149177 through PHLP-CRT-149179, that was produced in this litigation by KPNV and  
20 PENAC.

21       6. Attached hereto as Exhibit 5 is a true and correct copy of the document bates numbers,  
22 PHLP-CRT-064967 through PHLP-CRT-064968, that was produced in this litigation by KPNV and  
23 PENAC.

24       7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the Deposition of  
25 Jan De Lombaerde (10/9/2014) (“Lombaerde Dep.”).

26           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
27 knowledge and information.

1 Executed on January 23, 2015 in Washington, D.C.  
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4 /s/ Tiffany B. Gelott  
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Tiffany B. Gelott